

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

JOANN INC., et al.,¹

Debtors

Chapter 11

Case No. 25-10068 (CTG)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that the undersigned hereby enters his appearance in the above captioned case as counsel to **FOF 1073 LLC (“FOF”)**, a creditor herein, pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”); and such counsel requests, pursuant to Bankruptcy Rules 2002, 3017 and 9007 and sections 342 and 1109(b) of title 11 of the United States Code, and rule 2002-1(d) of the Local Rules of the United States Bankruptcy Court for the District of Delaware, that copies of all notices, pleadings, and documents of any kind filed or entered in these cases be given to and served upon **FOF** through its undersigned counsel at the following office and street address, including telephone number and Email address:

Stephen M. Kaplan, Esquire
Law Office of Stephen M. Kaplan
45 Addington Road
West Roxbury, MA 02132
Tel: (781) 248-6407
Email: kaplanlawworks@aol.com

¹ The Debtors in these chapter 11 cases, together with the last four digits of each Debtor’s tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (38140); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Dito Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings I, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtor’s mailing address is 5555 Darrow Road, Hudson, OH 44236.

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and the papers referred to in the Rules specified above, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading, order, or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, Email, delivery, telephone, telegraph, telex, or otherwise filed or given with regard to the above-referenced cases and the proceedings therein.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive **FOF's** right (i) to have final orders in non-core matters and certain core matters entered by an Article III judge or entered only after de novo review by a higher court; (ii) to a trial by jury in any proceeding so triable herein or in any related case, controversy or proceeding related hereto; (iii) to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which **FOF** is or may be entitled to under agreements, at law or in equity, all of which rights, claims actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: March 6, 2025

Respectfully submitted,
FOF 1073 LLC,
By its attorney,

/s/ Stephen M. Kaplan
Stephen M. Kaplan (MA-BBO# 259220)
45 Addington Road
West Roxbury, MA 02132-0230
ph: (781)248-6407
Email: kaplanlawworks@aol.com
c:/FOF1073LLC/notice of appearance

Ch. 11, Case No. 25-10068-CTG

CERTIFICATE OF SERVICE

I, Stephen M. Kaplan, attorney for **FOF 1073 LLC**, hereby certify that on this 6th day of March, 2025, I caused a true and correct copy of the foregoing Notice of Appearance and Request for Service of Papers to be electronically filed with the Clerk of the US Bankruptcy Court for the District of Delaware using the CM/ECF system, which sends notification to all counsel and parties of record who have registered for electronic service in this case.

/s/ Stephen M Kaplan

Stephen M. Kaplan (MA-BBO#259220)

c:/FOF1073LLC/notice of appearance